



PALMDALE WATER DISTRICT

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September 28, 2011

Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, California 95814

RE: AUGUST 2, 2011 DRAFT DELTA PLAN COMMENTS

Dear Chairman Isenberg and Members of the Council:

Palmdale Water District is located in the Antelope Valley in northern Los Angeles County. It relies on local surface water, local groundwater, and the State Water Project to meet customer water demands. The District is also a member of the State Water Contractors (SWC). We have reviewed the August 2, 2011 Draft Delta Plan (Fifth Draft Plan) individually and through the SWC and have concerns about it. The SWC has submitted an initial comment letter dated August 24, 2011 (copy enclosed) and is working on a more detailed set of comments.

We also wish to express our individual concerns with the Fifth Draft Plan being developed by the Delta Stewardship Council. While the Fifth Draft Plan is an improvement over previous drafts, uncertainties remain as to whether it will meet the co-equal goals of improved water supply reliability and Delta ecosystem health in its current form.

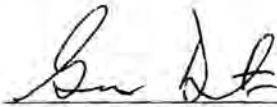
A major concern is the Fifth Draft Plan's vagueness about future water supply reliability. The Antelope Valley is expected to have significant growth in the future and we must be able to have a long-term understanding of water supply reliability to adequately address that growth. This level of planning must provide California certainty to help move forward and provide for economic stability.

We are also concerned about the Fifth Draft Plan's dictation of local water management decisions on subjects ranging from rate structures to recycling targets. The existing 20/20 requirements are adequate and allow local flexibility in meeting them. Palmdale Water District, for example, has already adopted a water budget based rate structure based on what was best for its situation and customers – not as a mandate from Sacramento. Local planning and decision making throughout California is more effective than micromanagement from Sacramento. The Council should focus its energy instead on improving water supplies, water reliability, and the ecosystem health of the Delta.

We respectfully urge the Council to fully consider these concerns and discuss the Alternate Delta Plan developed by statewide water, business and agricultural interests through the Ag-Urban Coalition. Council members are urged to work with the coalition to identify the best options for meeting the co-equal goals. We simply must get this plan right for the sake of our water supply, our economy and our environment.

Thank you for your time and consideration.

Sincerely,



Gordon Dexter, President



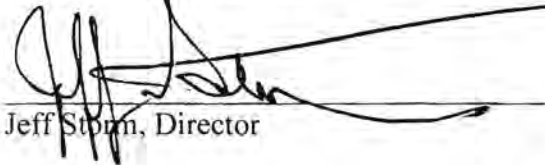
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Enclosures

San Luis & Delta-Mendota Water Authority



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August 24, 2011

Mr. Joe Grindstaff
Executive Officer, Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Subject: Fifth Staff Draft Delta Plan

Dear Mr. Grindstaff:

The Delta Stewardship Council has a rare opportunity to counter the misinformation and folklore that surrounds Delta discussions with a landmark planning document that accurately describes the estuary and existing water project operations. However, the fifth staff draft of the Delta Plan contains numerous inaccurate statements about the operations of the State Water Project (SWP) and the Central Valley Project (CVP) that add up to a false portrayal of these two water systems. Though representatives of our agencies are working to prepare detailed comments to the fifth draft Delta Plan, we feel compelled to briefly address a few of the more egregious examples.

Three examples:

1. *"More water is exported by the SWP and CVP in average or dry years than in wet years."* (Page 75). This is precisely the reverse from existing patterns. Over the past two decades, public water agencies have spent hundreds of millions of dollars developing a network of reservoirs and groundwater banks to capture surplus waters in wet years. As a result, the last five-year cycle of drought (lower deliveries) and recovery (higher deliveries) accurately reflect existing diversion patterns. The draft Delta Plan inaccurately portrays present-day operations by reviewing one previous dry year (2001) and one unusual wet year (1998), when flood and near-flood conditions compromised the ability of some agencies to import supplies. Basing generalizations on single years have led to wrong conclusions. **Figure 1**, below, is the Department of Water Resources (DWR) "reliability curve" that further illustrates the increased availability of water as precipitation increases.
2. *"2011 is the first wet year in which exports have exceeded 6 million acre-feet (Page 75).* This is not true. Exports in 2006--a wet year--exceeded 6 million acre-feet.



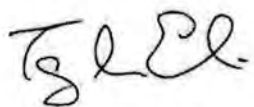
Figure 1. DWR "reliability curve"

3. *"The expectation that each year--wet, dry or average--should yield the same quantity of water exported from the Delta watershed is unrealistic..."* (Page 5) There is no such expectation. Rather, agreements anticipate varying supply availability. For example, in 2003 SWP contractors signed a Water Supply Contract amendment with DWR. It states: "The annual Table A Amounts and the terms of this contract reflect an expectation that under certain conditions (emphasis added), the District will receive its full Table A Amount; But that under other conditions, only a lesser amount, allocated in accordance with this contract, may be made available to the District." CVP customers also have water supply shortage provisions in their contracts that allow for changes in the amount of water made available for a variety of reasons.

Unfortunately, similar versions of these inaccuracies are repeated in the document. The result is an overall portrayal of Delta water project operations that is false. Wrong conclusions appear to be leading to wrong solutions. Representatives of our agencies will provide a more detailed response to the fifth draft Delta Plan at a later date. In the meantime, we offer our assistance to provide any information that you or your staff would find helpful.

Very truly yours,


Daniel G. Nelson
Executive Director
San Luis & Delta-Mendota Water Authority


Terry L. Erlewine
General Manager
State Water Contractors